

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA                    )  
  )  
          v.                                    )   Crim. Compl. No. 04-10172  
  )  
GABRIEL ESCAMILLA                         )

**JOINT MOTION TO MODIFY CONDITIONS OF RELEASE**

Now Comes defendant Gabriel Escamilla and the United States, by and through their respective counsel, and respectfully move this Court to grant defendant release upon the following conditions:

1. Defendant is presently held on a complaint charging him with possession of marijuana with intent to distribute.

2. The defendant and government agree that the following conditions of release would be sufficient to guarantee Mr. Escamilla's appearance at future proceedings, and respectfully request that the Court release Mr. Escamilla on the following conditions:

a. That Mr. Escamilla sign an unsecured bond in the amount of twenty-five thousand (\$25,000.00) dollars;

b. That he live with his wife, Armida Escamilla, at 1090 Sapphire Lane, Corona, CA. If his address is going to change, he must provide that new information to Pre-Trial Services with 72 hours' advance notice, and Pre-Trial Services must approve the change;

c. That he actively look for employment immediately upon release, and provide Pre-Trial Services with evidence of his

job search. If Mr. Escamilla is not employed within one month after his release, then he will be confined to his home from 4pm until 10 am, Monday through Friday, unless excused by Pre-Trial Services for job interviews, family events, health care visits or other reasons approved by Pre-Trial Services in advance. Upon securing full-time employment, the curfew will be automatically lifted upon Pre-Trial Services' confirmation of employment.

d. That he report to Pre-Trial Services on a schedule, and in a manner, to be determined by Pre-Trial Services, but no less frequently than once per week.

e. That he abide by all other statutory conditions of release.

Wherefore, the parties respectfully request that this Court release Mr. Escamilla under the conditions described above.

Gabriel Escamilla,  
By his Attorney

/S/ JAMES H. BUDREAU  
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AFFIDAVIT OF JAMES BUDREAU

I, James Budreau, do depose and state that the following is true and accurate to the best of my knowledge.

1. I represent Gabriel Escamilla in the above referenced criminal complaint.
2. I have spoken to AUSA Rachel Hershfang who has agree to file the instant joint motion. She has reviewed the motion and agreed to the conditions set forth therein.
3. I am a member of the Massachusetts Bar in good standing and I am filing this motion in good faith.

/S/ JAMES BUDREAU

JAMES BUDREAU